

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GM PHOTO, LLC

Plaintiff,

v.

FOCUS CAMERA, INC., MICHAEL
SILBERSTEIN, and CHASSY KIRZNER

Defendants.

Civil Action No.: 22-cv-10339 (VSB)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed the Memorandum of Law, and upon all pleadings and proceedings had heretofore herein, Wilson Elser Moskowitz Edelman & Dicker LLP, attorneys for Defendants FOCUS CAMERA, INC., MICHAEL SILBERSTEIN, and CHASSY KIRZNER (“Defendants”), hereby move this Court, before the Hon. Vernon S. Broderick at the United States District Court, 40 Foley Square, New York, New York 10007, for an order pursuant to Federal Rules of Civil Procedure 26(c) and 26(d) staying all proceedings in this action, pending the Court’s ruling on Defendants’ motion to dismiss (Dkt. No. 53-54), and awarding such further and other relief as this Court may deem just and proper.

Dated: New York, New York
April 12, 2023

Yours, etc.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP

By: /s/ Stephen Barrett

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